

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

In re:

RMS TITANIC, INC., *et al.*,<sup>1</sup>

Debtors.

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Case No. 3:16-bk-02230-PMG  
Chapter 11 (Jointly Administered)

**Hearing Time Requested:  
20 Minutes**

In re:

PREMIER EXHIBITIONS, INC.,

Debtor.

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Case No. 3:16-bk-02232-PMG  
Chapter 11

In re:

PREMIER EXHIBITIONS  
MANAGEMENT, LLC,

Debtor.

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Case No. 3:16-bk-02233-PMG  
Chapter 11 ,

In re:

PREMIER EXHIBITIONS  
INTERNATIONAL, LLC,

Debtor.

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Case No. 3:16-bk-02234-PMG  
Chapter 11 ,

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<sup>1</sup> The Debtors in the chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: RMS Titanic, Inc. (3162); Premier Exhibitions, Inc. (4922); Premier Exhibitions Management, LLC (3101); Arts and Exhibitions International, LLC (3101); Premier Exhibitions International, LLC (5075); Premier Exhibitions NYC, Inc. (9246); Premier Merchandising, LLC (3867); and Dinosaurs Unearthed Corp. (7309). The Debtors' service address is 3045 Kingston Court, Suite I, Peachtree Corners, Georgia 30071.

In re:

PREMIER EXHIBITIONS  
NYC, INC.,

Case No. 3:16-bk-02235-PMG  
Chapter 11 ,

Debtor.

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In re:

PREMIER MERCHANDISING, LLC,

Case No. 3:16-bk-02236-PMG  
Chapter 11 ,

Debtor.

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In re:

DINOSAURS UNEARTHED CORP.,

Case No. 3:16-bk-02237-PMG  
Chapter 11 ,

Debtor.

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In re:

ARTS AND EXHIBITIONS  
INTERNATIONAL, LLC,

Case No. 3:16-bk-02238-PMG  
Chapter 11

Debtor.

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**DEBTORS' OMNIBUS OBJECTION TO THE  
CLAIMS FILED BY THE ARMADA GROUP GP, INC.**

**IMPORTANT NOTICE: THIS IS AN OBJECTION TO YOUR CLAIM  
LOCATE YOUR NAME AND CLAIM INFORMATION BELOW**

Pursuant to Local Rule 2002-4, the Court will consider relief requested in this paper without further notice or hearing unless a party in interest files an objection within thirty (30) days from the date set forth on the attached proof of service, plus an additional three days for service if any party was served by U.S. Mail.

If you object to the relief requested in this paper, you must file a response with the Clerk of the Court at Bryan Simpson United States Courthouse, 300 North Hogan Street, Suite 3-350, Jacksonville, Florida 32202, and serve a copy on the movant's attorney, Daniel F. Blanks, Esq., Nelson Mullins Riley & Scarborough LLP, 50 N. Laura Street, Suite 4100, Jacksonville, Florida 32202, and any other appropriate persons within the time allowed. If you file and serve a response within the time permitted, the Court will either schedule and notify you of a hearing, or consider the response and grant or deny the relief requested without a hearing.

If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

RMS Titanic, Inc. and certain of its affiliates, as Debtors and Debtors in possession in the above-captioned cases (collectively, the "Debtors"), by and through its undersigned counsel, request that the Court disallow each of the claims filed by The Armada Group GP, Inc. (the "Creditor" or "Armada") pursuant to Sections 501, 502, and 1106(a)(1) of Title 11 of the United States Code, 11 U.S.C. § 101 et seq. (as amended the "Bankruptcy Code"), Rule 3007 and 9014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 3007-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Middle District of Florida (the "Local Rules"). In support of the relief sought herein (the "Objection"), the Debtors state as follows:

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction to consider this Objection pursuant to 28 U.S.C. §§ 157 and 1334. The subject matter of this Objection is a core proceeding pursuant to 28 U.S.C. §157(b)(2).

2. Venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicates for the relief requested by this Objection are Sections 501, 502, and 1106(a)(1) of the Bankruptcy Code, Bankruptcy Rules 3007 and 9014, and Local Rule 3007-1.

### **BACKGROUND**

4. On June 14, 2016 (the “Petition Date”), each of the Debtors filed a voluntary petition in this Court for relief under Chapter 11 of the Bankruptcy Code. The factual background regarding the Debtors, including their business operations, capital and debt structure, and the events leading to the filing of this bankruptcy case, are set forth in detail in the Chapter 11 Case Management Summary (the “Case Summary”) [D.E. 8].

5. The Debtors continue to manage and operate their business as debtors in possession under Bankruptcy Code sections 1107 and 1108.

6. On August 24, 2016, the United States Trustee appointed an Official Committee of Unsecured Creditors and an Official Committee of Equity Security Holders [D.E. 166, 167].

**RELIEF REQUESTED**

7. Section 502(a) of the Bankruptcy Code provides that “[a] claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects.” A debtor in possession has the duty to object to the allowance of any claim that is improper. See 11 U.S.C. § 1106(a)(1).

8. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. See In re Allegheny Int’l, Inc., 954 F.2d 167, 173 (3d Cir. 1992). Bankruptcy courts have generally held that in order to receive the benefit of *prima facie* validity, however, the claimant must set forth facts necessary to support the claim. See COLLIER ON BANKRUPTCY ¶ 3001.01 (16th ed. revised 2016)). Additionally, a claimant’s proof of claim is entitled to the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) only until an objecting party shows that there exists a true dispute as to the validity and amount of the claim. See id at 3001.09[2]. Once the objecting party refutes an allegation critical to the claim, the burden reverts to the claimant to prove the validity of the claim by a preponderance of the evidence. “The debtor, however, need only present evidence supporting its objection in order to shift the burden of proving the claim back to the claimant. “ In re Rasbury, 141 B.R. 752, 757 (Bankr. N.D. Ala. 1992). In other words, once the *prima facie* validity of a claim is rebutted, “it is for the claimant to prove his claim, not for the objector to disprove it.” In re Kahn, 114 B.R. 40, 44 (Bankr. S.D.N.Y. 1990) (citations omitted).

9. For the reasons set forth in this Objection, the Armada Claims (as hereinafter defined) should be disallowed in their entirety. If not disallowed as requested herein, the Creditor will receive recoveries to which it is not entitled, to the detriment of the Debtors' other stakeholders. Thus, the relief requested herein is necessary to prevent any inappropriate distribution of estate funds and to facilitate the administration of the claims-allowance process.

### **OBJECTION AND BASIS FOR RELIEF**

10. On July 12, 2016, the Court entered the Notice of Commencement of Case, Section 341 Meeting of Creditors, and Fixing Deadlines which set a proof of claim bar date of October 24, 2016 [D.E. 83].

11. On July 15, 2016, the Debtors filed their Schedules and Statements of Financial Affairs.

12. Approximately 80 claims have been filed asserting approximately \$135 million in the aggregate. Many of these claims are duplicative and assert claims for which the Debtors have no liability. The Debtors and their advisors are in the process of reviewing the proofs of claim, including supporting documentation, if any, filed together with any proof of claim, and reconciling the proofs of claims with the Debtors' books and records to determine the validity of the proofs of claim. For the reasons set forth in more detail below, and based on their review to date, the Debtors have determined that the Armada Claims (as hereinafter defined) are objectionable, and the Debtors dispute all liability.

13. On August 9, 2016, Armada filed Claim No. 10 in Case No. 3:16-bk-02232-PMG asserting a general unsecured claim in the amount of \$10,000,000.00.

14. On October 21, 2016, Armada filed Claim No. 33-1 Case No. 3:16-bk-02230-PMG asserting a general unsecured claim in the amount of \$10,000,000.00.

15. On October 21, 2016, Armada filed Claim No. 33-1 in Case No. 3:16-bk-02232-PMG asserting a general unsecured claim in the amount of \$10,000,000.00.

16. On October 24, 2016, Armada filed Claim No. 33-2 in Case No. 3:16-bk-02232-PMG asserting a general unsecured claim in the amount of \$10,000,000.00.

17. On October 21, 2016, Armada filed Claim No. 16-1 in Case No. 3:16-bk-02233-PMG asserting a general unsecured claim in the amount of \$10,000,000.00.

18. On October 24, 2016, Armada filed Claim No. 16-2 in Case No. 3:16-bk-02233-PMG asserting a general unsecured claim in the amount of \$10,000,000.00.

19. On October 21, 2016, Armada filed Claim No. 2-1 in Case No. 3:16-bk-02234-PMG asserting a general unsecured claim in the amount of \$10,000,000.00.

20. On October 24, 2016, Armada filed Claim No. 2-2 in Case No. 3:16-bk-02234-PMG asserting a general unsecured claim in the amount of \$10,000,000.00.

21. On October 21, 2016, Armada filed Claim No. 3-1 in Case No. 3:16-bk-02235-PMG asserting a general unsecured claim in the amount of \$10,000,000.00.

22. On October 24, 2016, Armada filed Claim No. 3-2 in Case No. 3:16-bk-02235-PMG asserting a general unsecured claim in the amount of \$10,000,000.00.

23. On October 21, 2016, Armada filed Claim No. 1-1 in Case No. 3:16-bk-02236-PMG asserting a general unsecured claim in the amount of \$10,000,000.00.

24. On October 24, 2016, Armada filed Claim No. 1-2 in Case No. 3:16-bk-02236-PMG asserting a general unsecured claim in the amount of \$10,000,000.00.

25. On October 21, 2016, Armada filed Claim No. 2-1 in Case No. 3:16-bk-02237-PMG asserting a general unsecured claim in the amount of \$10,000,000.00.

26. On October 24, 2016, Armada filed Claim No. 1-2 in Case No. 3:16-bk-02237-PMG asserting a general unsecured claim in the amount of \$10,000,000.00.

27. On October 21, 2016, Armada filed Claim No. 1-1 in Case No. 3:16-bk-02238-PMG asserting a general unsecured claim in the amount of \$10,000,000.00.

28. On October 24, 2016, Armada filed Claim No. 1-2 in Case No. 3:16-bk-02238-PMG asserting a general unsecured claim in the amount of \$10,000,000.00. Collectively, all of the claims filed by Armada against the Debtors are the “Armada Claims.”

29. Each of the Armada Claims is substantively identical. A true and correct copy of the claim filed against RMST, Inc. is attached hereto as Exhibit A as an example of the Armada Claims.

30. The Armada Claims assert claims against the Debtors for vicarious liability relating to a breach of contract claim against non-Debtors. The Claim purportedly relates to litigation currently pending in the United States District Court for the Northern District of Illinois in the matter styled *Sellers Capital, LLC et al. v. Armada Group, GP, Inc., et al.*, Case No. 15cv17644 (the “District Court Litigation”). In the District Court Litigation, Sellers Capital LLC (“Sellers Capital”) sued Armada and others for breach of contract resulting from Armada’s failure to perform under a



contract to purchase stock of debtor Premier Exhibitions, Inc. (“PRXI”). Armada sought **and was denied** leave in the District Court Litigation to bring a third party complaint against Samuel Weiser (“Weiser”), the former CEO of the Debtors from November 2011 to June 2014, for his alleged tortious interference with Armada’s contract with Sellers Capital.

31. Armada sought to allege that Weiser tortiously interfered with Armada’s contractual relationship with Sellers Capital which induced Armada’s nonperformance and breach of the contract, resulting in damages to Armada in the form of lost value of the PRXI shares it was to acquire and revenue that it could have generated through its ownership of the PRXI shares. The Court in the District Court Litigation denied Armada relief to assert the claims it alleged against Weiser by an order entered on November 28, 2016, a true and correct copy of which is attached hereto as Exhibit B and incorporated herein by reference. Among other things, the Court held:

the claims asserted in Defendants’ proposed third-party complaint do not state proper claims for relief for tortious interference with contract. *See IBEW, Local 134 v. Cunningham*, 2013 U.S. Dist. LEXIS 61083, at \*17-18 (N.D. Ill. April 29, 2013); *McCoy v. Gamesa Tech Corp.*, 2012 U.S. Dist. LEXIS 9431, at \*23 (N.D. Ill. January 26, 2012). *See also Chicago United Indus. V. City of Chicago*, 669 F.3d 847, 853 (7<sup>th</sup> Cir. 2012); *House of Brides, Inc. v. Alfred Angelo, Inc.*, 2014 U.S. Dist. LEXIS 167887, at \*27 (N.D. Ill. December 4, 2014).

A more detailed discussion of why Armada’s proposed third party complaint against Weiser failed to state a claim for which relief can be granted is set forth in detail in Plaintiff’s Memorandum in Opposition to Defendants’ Motion for Leave to File Third-

Party Complaint filed in the District Court Litigation, a true and correct copy of which is attached hereto as Exhibit C and incorporated herein by reference, at pp. 5-11. Among other reasons, a claim for tortious interference with contract requires improper interference with a third party that induces **the third party** to breach a contract. In this case, Armada seeks to allege that Weiser's conduct caused Armada itself to breach its contract with Sellers Capital. Such allegations fail to properly state a claim for tortious interference with contract.

32. Armada seeks in the Armada Claims to hold the Debtors vicariously liable for the alleged tortious interference committed by Weiser. Because Armada cannot state a viable claim against Weiser for tortious interference with a contract, it likewise has no claim for vicarious liability against the Debtors. Moreover, a claim against the Debtors is even more remote and attenuated than a claim against Weiser personally, as a claim against the Debtors would require an additional finding that Weiser was acting in his professional capacity as an agent of the Debtors, and not in his personal capacity as a shareholder of Sellers Capital.

33. Even if it could state such a claim, and it cannot, Armada provides absolutely no basis or documentation that would support a claim against the Debtors for \$10 million or in any amount. Armada has filed multiple claims in the exact same amount alleging the same basis in each of the Debtors' cases, and each of those claims should be disallowed in its entirety.

34. Accordingly, the Armada Claims should be disallowed in their entirety.

**RESERVATION OF RIGHTS**

35. The Debtors expressly reserve the right to amend, modify, or supplement this Omnibus Objection and to file additional substantive or non-substantive objections to the Armada Claims or any other claim, filed or not, that may be asserted against the Debtors. Should one or more of the grounds of objection stated in this Omnibus Objection be overruled, the Debtors reserve the right to object on any other applicable grounds. In addition, the Debtors reserve the right to seek to reduce any Claim for any reason, including to the extent such Claim has been paid. The Debtors reserve the right to raise further objections, including objections under Section 502(d) of the Bankruptcy Code. Nothing in this Omnibus Objection or the relief requested herein will limit the right of the Debtors to bring additional objections to any claims on any basis.

**NOTICE**

36. Notice of this Omnibus Objection will be provided to all parties entitled to notice pursuant to that certain Order Granting Motion for Approval Pursuant to 11 U.S.C. 105(a) and Rule 2002 Establishing Notice Procedures [D.E. 140].

**NO PRIOR REQUEST**

37. No prior request for the relief sought in this Objection has been made to this or any other court.

**CONCLUSION**

WHEREFORE, the Debtors respectfully requests that the Court (A) grant this Omnibus Objection; (B) disallow each of the Armada Claims in their entirety; and (C) grant such other and further relief as is just and proper.

NELSON MULLINS RILEY  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF on January 6, 2017. I also certify that the foregoing document is being served this day on the following counsel of record via transmission of Electronic Filing generated by CM/ECF:

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